

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMY VELEZ, PENNI ZELINKOFF, MINEL
HIDER TOBERTGA, MICHELLE
WILLIAMS, JENNIFER WAXMAN-RECHT,
KAREN LIGGINS, LORI HORTON,
HOLLY WATERS, WENDY PINSON,
ROBERTA VONLINTEL, ASHLEY
NARMOUR, CATHERINE WHITE, KELLY
CORBETT, SUE EARL, JAMIE HOLLAND,
JOAN DURKIN, SIMONA LOPES,
MARYANNE JACOBY and MARTA
DEYNE,

04 Civ. 09194 (CM)

Individually and on Behalf of Others
Similarly Situated,

Plaintiffs,

v.

NOVARTIS PHARMACEUTICALS
CORPORATION,

Defendant.

**DEFENDANT NOVARTIS PHARMACEUTICALS CORPORATION'S
NOTICE OF ITS MOTION FOR JUDGMENT AS A MATTER OF LAW**

PLEASE TAKE NOTICE THAT, upon its accompanying Memorandum in Support of its Motion for Judgment as a Matter of Law and Appendix in Support of its Motion for Judgment as a Matter of Law, Defendant Novartis Pharmaceuticals Corporation ("NPC"), by its attorneys, Vedder Price P.C., hereby moves this Court for an Order pursuant to Rule 50(a) of the Federal Rules of Civil Procedure granting judgment as a matter of law to NPC on Plaintiffs' class pay and promotion to first-line manager discrimination claims, and class harassment and hostile work environment on the basis of pregnancy claims, on the grounds that Plaintiffs have failed to

satisfy their *prima facie* burden for these claims. Accordingly, NPC is entitled to judgment as a matter of law pursuant to Fed. R. Civ. P. 50(a) on these claims.

NOVARTIS PHARMACEUTICALS
CORPORATION

By: /s/ Richard H. Schnadig
One of Its Attorneys

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Dated: April 27, 2010

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true and correct copy of the foregoing DEFENDANT'S NOTICE OF MOTION FOR JUDGMENT AS A MATTER OF LAW was filed electronically and served on the following by depositing same in the United States mail, with proper first-class postage prepaid, before 5:00 p.m. on April 27, 2010:

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